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9 Attorneys for Defendant
10 CONNECTU, INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 THE FACEBOOK, INC. and MARK
15 ZUCKERBERG,

Plaintiffs,

v.

16 CONNECTU, INC. (formerly known as
17 CONNECTU, LLC), PACIFIC NORTHWEST
18 SOFTWARE, INC., WINSTON WILLIAMS,
and WAYNE CHANG,

Defendants.

Case No. 5:07-CV-01389-JW

**CONNECTU'S ADMINISTRATIVE
MOTION TO SEAL:**

- (1) CONNECTU'S OPPOSITION TO PLAINTIFFS' ADMINISTRATIVE REQUEST PURSUANT TO CIVIL L.R. 7-11;**
- (2) DECLARATION OF EVAN A. PARKE AND EXHIBITS IN SUPPORT THEREOF; AND**
- (3) [PROPOSED] ORDER ON ADMINISTRATIVE REQUEST PURSUANT TO CIVIL L.R. 7-11**

1 Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this
2 administrative motion asking the Court to file under seal ConnectU's Opposition To
3 Plaintiffs' Administrative Request Pursuant To Civil L.R. 7-11; Declaration of Evan A.
4 Parke and exhibits In Support Thereof; and Proposed Order On Administrative Request
5 Pursuant To Civil L.R. 7-11.

6 The parties entered into, and the Superior Court of California, Superior County
7 issued, a Stipulated Protective Order on January 23, 2006, prohibiting either party from
8 filing in the public record any documents that have been designated as "Confidential" or
9 "Highly Confidential" pursuant to the protective order.

10 ConnectU's Opposition To Administrative Request and documents filed in
11 support thereof contain information that Facebook, in its motion to seal, alleges is
12 covered by the Protective Order. Other documents and information at issue in this
13 request (1) have been designated by Plaintiffs as Confidential or Highly Confidential and
14 covered by the Protective Order and/or (2) are alleged by Plaintiffs to implicate
15 confidentiality provisions found in a purported agreement which is the subject of dispute
16 between the parties.¹

17 ConnectU requests that its Opposition to the Administrative Request and
18 supporting papers remain sealed.

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¹ By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility
27 or inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-
28 confidentiality of information relating to the purported agreement, or (iii) the enforceability or
unenforceability of the purported agreement.

1 Dated: May 14, 2008

2 /s/ Steven C. Holtzman

3 Steven C. Holtzman

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13 CONNECTU, INC.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that this document(s) filed through the ECF system will be sent
3 electronically to the registered participants as identified on the Notice of Electronic Filing
4 (NEF) and paper copies will be sent to those indicated as non registered participants on
5 May 14, 2008.

6

7

8 Dated: May 14, 2008

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11 /s/ *Steven C. Holtzman*

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